

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE
DISTRICT OF PENNSYLVANIA**

IN RE:

MIGDALIA ESPINET

Case Number: **5:19-bk-02874-MJC**

Chapter: **13**

MOTION TO RECONSIDER, ALTER, AMEND OR VACATE ORDER

NOW COMES Migdalia Espinet, through her attorney, Mark E. Moulton, Esquire, and requests the Honourable Court to reopen the Chapter 13 Bankruptcy that was filed in the Debtor's name. The following is alleged in support thereof:

1. Debtor filed Chapter 13 Bankruptcy on July 03, 2019 in the above captioned case.
2. The case was examined by the office of the Trustee, Jack N Zaharopoulos.
3. Debtor's Chapter 13 Repayment Plan was confirmed on July 2, 2020.
4. The Trustee's office issued a Notice re: Review of Ch. 13 Final Report (all payments made) on December 9, 2024.
5. Debtor's counsel thought the required certificate had been filed, but after receiving the notice of case closure discovered that the drafted certificate was not filed instead the case was closed.
6. Debtor's case was closed without discharge on January 14, 2025.
7. The Notice of case closure without discharge has not yet been mailed out.
8. The required certificate in support of discharge has been filed contemporaneously with the instant motion.

WHEREFORE, counsel for the Debtor, Migdalia Espinet, humbly prays the Honourable Court to issue an Order reopening the Bankruptcy case in order to obtain a discharge.

s/Mark E. Moulton, Esquire
Attorney for Debtor ID 89064
693 Route 739, Suite 1
Lords Valley, PA 18428

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CERTIFICATE OF SERVICE

I, Mark e. Moulton, esquire, do hereby certify that I caused a true and correct copy of the foregoing Motion To Reconsider Bankruptcy Case Closure Without Discharge to be sent via the PACER/ ECF system to the Trustee and necessary parties.

S/ Mark E. Moulton,
Counsel for Debtor

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**ORDER TO REOPEN BANKRUPTCY CASE AND EXTEND THE TIME FOR
FILING THE CERTIFICATE IN SUPPORT OF DISCHARGE REQUIRED
BY RULE 1328.**

AND NOW, after consideration of the within Motion of counsel for Debtor, it is hereby,

ORDERED that the case be reopened and the time be extended for filing a
certificate in support of discharge.